

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS**

DAMONIE EARL, LINDA RUGG, ALESA  
BECK, TIMOTHY BLAKEY, JR.,  
STEPHANIE BLAKEY, MARISA  
THOMPSON, MUHAMMAD MUDDASIR  
KHAN, ELIZABETH COOPER, JOHN  
ROGERS, VALERIE MORTZ-ROGERS, and  
LAKESHA GOGGINS, each individually and  
on behalf of all others similarly situated,

*Plaintiffs.*

v.

THE BOEING COMPANY,  
SOUTHWEST AIRLINES CO.,

*Defendants.*

Civil Action No. 4:19-cv-00507

**BATHAE DUNNE LLP, DOVEL & LUNER, LLP,  
AND CAPSHAW DERIEUX LLP'S RESPONSE TO  
WILLIAMSON'S REQUEST FOR *EX PARTE* HEARING AND *IN CAMERA* REVIEW**

Bathae Dunne LLP, Dovel & Luner, LLP, and Capshaw DeRieux LLP (“Responding Counsel”) submit this joint response to Andrew Williamson’s Notice Regarding Statements Made on the Record at the May 13, 2020 Hearing in this Matter and Request for *Ex Parte* In Camera Hearing (Dkt. No. 100) (the “Notice”). In the Notice, Mr. Williamson alleges that Mr. Hecht—while speaking on behalf of himself, Andrew Lorin, Pierce Bainbridge Beck Price & Hecht (“PB”) and/or “others that [he is] affiliated with” (May 13 Tr. at 5:1-3; *see also id.* at 3:13-14, 4:9-12)—made “numerous statements of material fact” that are “inaccurate, and may have been made to intentionally mislead counsel and the Court” (Notice at 1). Responding Counsel agree with Mr. Williamson and Defendants that a hearing is appropriate and accordingly do not oppose Mr.

Williamson's request for one, but respectfully take no position as to the appropriateness of *in camera* submissions to the Court or as to whether an *ex parte* hearing is necessary.<sup>1</sup>

Dated: May 23, 2020

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<sup>1</sup> After Boeing filed its response to Mr. Williamson (Dkt. No. 102), Mr. Hecht moved on May 22nd to withdraw Mr. Williamson and Mr. Pomerantz's appearances in this case, and stated in his certificate of conference that "counsel for Plaintiffs" met and conferred with Defendants, Mr. Williamson and Mr. Pomerantz. (Dkt. No. 103, at 2.) That is incorrect. Responding Counsel were not part of any purported conferences with Mr. Williamson and Mr. Pomerantz, nor were Responding Counsel privy to any meet and confer with Defendants (other than being included on a last-minute e-mail chain hours before Mr. Hecht's filing). Responding Counsel do not oppose Mr. Williamson's and Mr. Pomerantz's withdrawals, but neither adopt, nor agree with, the unparseable prefatory statement in Mr. Hecht's motion.

**CERTIFICATE OF SERVICE**

I hereby certify that on May 23, 2020, a true and correct copy of the above was served via email through the Eastern District of Texas's CM/ECF system.

/s/ Yavar Bathaee  
Yavar Bathaee